

PUBLIC UTILITIES COMMISSION

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March 27, 2018

Ryan Stevenson
Principal Advisor
Regulatory Affairs
Southern California Edison
8631 Rush St, General Office 4 – 235E (2nd Floor)
Rosemead, CA, 91770

RE: West of Devers Upgrade Project: Minor Project Refinement #9

Dear Mr. Stevenson,

On March 26, 2018, Southern California Edison (SCE) submitted the request for Minor Project Refinement #9 for the use of the El Casco access road driveway, from the south wall of the substation to San Timoteo Canyon Road, and three adjacent work areas for the staging of work trucks, equipment, and materials associated with the stringing of overhead fiber optic cable on the existing distribution poles located along the access road, as well as use of a walking path, approved by the California Public Utilities Commission (CPUC) under Notice to Proceed No. 3, August 10, 2017 (Telecom) in support of the West of Devers Upgrade Project, in Riverside County, California. Additional information was provided on March 27, 2018.

The CPUC voted on August 18, 2016 to approve SCE's West of Devers Upgrade Project (Decision D.16-08-017) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2014051041).

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) to ensure compliance with all mitigation measures imposed on the West of Devers Upgrade Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as final project design and engineering or need for addition workspace, are anticipated and common practice for construction efforts of this scale and that a Minor Project Refinement request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this Minor Project Refinement, and that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities.

Minor Project Refinements are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. Minor Project Refinements do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

Minor Project Refinement #9 for use of the existing access road, three additional work areas, and walking paths to the previously approved Telecom alignment is granted by CPUC based on the factors described below.

SCE Minor Project Refinement Request. Excerpts from the SCE Minor Project Refinement request, received March 26, 2018, are presented below (indented):

Modifications to NTP #3 Telecom Work Area Mapping

The El Casco access road driveway, from the south wall of the substation to San Timoteo Canyon Road, is required for the staging of work trucks, equipment, and materials associated with the stringing of overhead fiber optic cable on the existing distribution poles located along the access road. In addition, a walking path is required under the existing distribution pole line. Walking paths from each distribution pole to the access road are also required, in addition to 3 equipment staging areas. Walking paths will be delineated in the field to avoid/minimize impacts to vegetation caused by foot traffic and equipment staging, where possible. Smooth tarplant in the vicinity have been flagged for avoidance. The following temporary impacts will occur: Los Angeles pocket mouse suitable habitat - 0.63 acre, Stephen's kangaroo rat suitable habitat - 0.94 acre.

CPUC Evaluation of Minor Project Refinement Request

In accordance with the MMCRP, the subject Minor Project Refinement request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested Minor Project Refinement activities and that the subject request was within the geographic boundary of the Project study area. The following discussion summarizes this analysis for agriculture, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use, noise, paleontological resources, traffic and transportation, visual resources, water resources, and wildland fire. A list of bulleted conditions is presented to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs), and are based on specific site conditions and/or are proposed conditions by SCE.

Agricultural: No Important Farmland will be impacted with the implementation of this MPR.

Air Quality: During proposed construction, SCE shall implement the Fugitive Dust Control Plan approved by the CPUC on May 22, 2017, as well as the Exhaust Emissions Control Plan approved by CPUC on June 8, 2017. In addition, in compliance with MM AQ-1b, off-road equipment with engines larger than 50 horsepower shall have engines that meet or exceed U.S. EPA/CARB Tier 3 Emissions Standards. No additional impacts to air quality will occur with the implementation of MPR.

Biological Resources: SCE submitted biological resource survey information with the MPR #9 request. The existing access road and work areas described in MPR #9 are located in developed, disturbed, and revegetated areas near the El Casco Substation. No ground disturbance is proposed for use of the subject access road/paths and staging areas. This location was included in the study area for previous habitat assessments and focused/protocol surveys. In addition, a preconstruction survey conducted on March 14, 2018 for the El Casco Substation and the access road was completed. A preconstruction survey was also conducted on March 21, 2018 for the El Casco Telecom alignment.

Special-status Wildlife and Nesting Birds: The work areas and vicinity include moderately suitable habitat for burrowing owls (*Athene cunicularia*), but no burrowing owls or potential burrows were observed during the preconstruction surveys. Suitable substrates for nesting birds, including trees, shrubs, man-made structures, and the ground surface, are located in the vicinity of the work area. One red-shouldered hawk (*Buteo lineatus*) nest was observed during preconstruction surveys for the El Casco substation on March 14, 2018. The nest is approximately 150 feet southwest of existing distribution pole 4380934E and 88 feet south of the existing access road. A buffer reduction will be prepared in accordance with the Nesting Bird Management Plan. Riparian habitat associated with San Timoteo Creek east of the substation provides suitable habitat for least Bell's vireo (*Vireo bellii pusillus*) and they were observed during 2012 and 2013 surveys; however, no least

Bell's vireos were observed during the preconstruction surveys. Habitat marginally suitable for golden eagle (*Aquila chrysaetos*) nesting is located within 2 miles of the work location; however, no golden eagle nests were identified within 2 miles of the work location during protocol aerial surveys conducted in 2016 and 2017. While golden eagles may forage in the vicinity of the work location, no impacts are anticipated. Nesting bird surveys will be ongoing during the nesting season and buffers will be implemented where required per the Nesting Bird Management Plan, and construction crews will adhere to procedures described in the Wildlife Noise Monitoring Plan.

The work areas are located in suitable habitat for Stephen's kangaroo rat. Trapping surveys focused on Los Angeles pocket mouse were conducted in 2015 and no Los Angeles pocket mouse or Stephen's kangaroo rat were trapped; however, the Northwestern San Diego pocket mouse was trapped in the vicinity of the existing telecom poles. A preconstruction survey for Stephen's kangaroo rat was recently conducted by Stephen Myers, a biologist holding a USFWS recovery permit for the species. No sign of Stephen's kangaroo rat was observed. No ground-disturbing activities are planned. Temporary impacts to Los Angeles pocket mouse suitable habitat is 0.63 acre, and Stephen's kangaroo rat suitable habitat is 0.94 acre.

Special-status Plants and Trees: Special-status plant species, smooth tarplant (*Centromadia pungens* ssp. *laevis*), are adjacent to the work areas and have been flagged for avoidance. No trees are located in the work area.

Jurisdictional Features: San Timoteo Creek, its tributaries, and the associated riparian areas are mapped as jurisdictional; however, no dredge, fill, or removal of riparian vegetation will occur and impacts to jurisdictional waters will be avoided.

No additional impacts to biological resources will occur with the implementation of this MPR.

Cultural Resources: SCE submitted cultural resource information with the MPR #9 request. The El Casco Substation access road work areas are located within the WOD Area of Potential Effect (APE) and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey results for the area were negative for cultural resources. No ground disturbance is proposed for use of the subject access road/paths and staging areas. In the event of unanticipated discoveries, the Project Cultural Resources Management Plan will be implemented. No additional impacts to cultural resources will occur with the implementation of this MPR.

Geology and Soils: SCE conducted geotechnical studies to evaluate faults, landslides and unstable slopes, and soil characteristics as outlined in MMs G-1a, G-2a, and G-5a. The geotechnical survey reports were reviewed and approved by the CPUC on August 17, 2017. No additional impacts to geology and soils will occur with the implementation of this MPR.

Hazards and Hazardous Materials: As required by MM HH-1a, SCE prepared and submitted a Hazardous Materials and Waste Management Plan to the CPUC on September 27, 2017. Hazardous materials used and stored on site for the duration of construction activities and will be managed according to the Plan. A Soil Management Plan has been developed consistent with MMs HH-2a and HH-3a to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities, including soil samples to be collected in construction areas where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. SCE's Soil Management Plan was combined with the Hazardous Materials and Waste Management Plan described above. Also, SCE's contractor submitted information including written procedures for fueling

and maintenance of construction equipment and an Emergency Response Plan. No additional impacts from hazards or hazardous materials will occur with the implementation of this MPR.

Land Use: As required by MM LU-1a, a Construction Notification Plan was prepared by SCE and approved by CPUC on May 22, 2017. The Plan identified the procedures to ensure that SCE will inform property and business owners of the location and duration of construction. The Plan includes provisions for public noticing including mailers, newspaper advertisements, public venue notices, and includes the establishment of a public liaison and toll-free information hotline. No additional impacts to land use will occur with the implementation of this MPR.

Noise: Best Management Practices for construction noise management will be implemented as outlined in MM N-1a to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction. Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with local jurisdiction. Construction traffic and helicopter flights shall be routed away from residences and schools, where feasible. No additional impacts to noise will occur with the implementation of this MPR.

Paleontological Resources: A Paleontological Resource Mitigation and Monitoring Plan (PRMMP) has been completed for the West of Devers Upgrade Project and was approved by the CPUC on May 9, 2017. No ground disturbance is proposed for use of the subject access road/paths and staging areas. In the event of unanticipated discoveries, MM PAL-1d and the PRMMP requirements would be implemented. No additional impacts to paleontological resources will occur with implementation of this MPR.

Traffic and Transportation: Consistent with MM T-1a and MM T-1b, Construction Transportation and Traffic Control Plans have been developed and approved. The Construction Transportation Plan describes timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways. No additional impacts to traffic and transportation will occur with the implementation of this MPR.

Visual Resources: The use of an existing access road and work areas for stringing of overhead fiber optic cables on existing distribution poles described in this Minor Project Refinement #9 are no different than what was described in NTP #3 and are temporary. No additional impacts to visual resources will occur with the implementation of this MPR.

Water Resources: As required by MM WR-2a, SCE developed and submitted an Erosion Control Plan to the CPUC and BLM. The Erosion Control Plan was incorporated into the Stormwater Pollution Prevention Plan (SWPPP), which will be kept onsite and readily available on request. SCE submitted the SWPPP to the CPUC on May 25, 2017. Any changes necessitated by this MPR will be incorporated into the SWPPP document. No additional impacts to water resources will occur with the implementation of this MPR.

Wildland Fire: SCE submitted a Fire Management Plan on February 10, 2017 to satisfy the conditions of MM WF-1a and the Plan was approved by the CPUC on July 18, 2017. This Fire Management Plan has been submitted to local fire departments. No additional impacts to wildland fire will occur with the implementation of this MPR.

The conditions noted below shall be met by SCE and its contractors:

- All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this Minor Project Refinement shall be available on site for the duration of construction activities. All permits and plans shall be made available to the CPUC EM upon request.
- SCE shall provide CPUC with the revised GIS data, which includes the project changes in this MPR #9.
- All crew members shall be WEAP trained prior to working on the Project. A log shall be maintained on-site with the names of all crew personnel trained. The WEAP training brochure can be provided in Spanish or other languages if appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Minor Project Refinement request shall be submitted for CPUC review.

Sincerely,



Billie Blanchard
CPUC Environmental Project Manager

cc: V. Strong, Aspen